

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ACL1 INVESTMENTS LTD., ACL2 INVESTMENTS LTD., JORVIK MULTI-STRATEGY MASTER FUND, L.P., LDO XVII INC., YORK CAPITAL MANAGEMENT, L.P., YORK CREDIT OPPORTUNITIES FUND, L.P., YORK CREDIT OPPORTUNITIES INVESTMENTS MASTER FUND, L.P., and YORK MULTI-STRATEGY MASTER FUND, L.P.,

Plaintiffs,

V.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

No. 19-cv-09014-LLS

**STIPULATION AND**  
**[PROPOSED] ORDER**

**WHEREAS**, the Court entered a stipulation on June 12, 2020 adjourning until July 15, 2020 the time for Defendant Bolivarian Republic of Venezuela (the “Republic”) to answer Plaintiffs’ Complaint in order to allow the parties to conduct informal discovery, Dkt. 38;

**WHEREAS**, the Parties are continuing to conduct discovery in an effort to reduce matters in dispute;

**IT IS HEREBY STIPULATED AND AGREED**, by and between Plaintiffs and Defendant, by their undersigned counsel, that:

1. Defendant's time to answer or otherwise respond to the Complaint is adjourned until August 17, 2020.

2. This Stipulation may be executed in counterparts and electronic signatures shall be deemed as an original execution.

Dated: July 13, 2020  
New York, New York

SULLIVAN & CROMWELL LLP

*/s/ Joseph E. Neuhaus*

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*Attorneys for Defendant Bolivarian Republic of  
Venezuela*

Dated: July 13, 2020  
New York, New York

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UNTEREINER & SAUBER LLP

*/s/ Joshua S. Bolian*

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*Attorneys for Plaintiffs*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2020.

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Honorable Louis L. Stanton  
United States District Court Judge